Questions & Answers for SR Update 05

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26.   When a facility's classification changes, does it still have to report?

27.   When a facility closes, does it still have to file a Source Registration?

28.   Do you have to report if you didn't get a letter from MassDEP?

29.   Will changes filed in my Source Registration (such as decommissioned units) result in MassDEP changing my classification for fee purposes?

30.   Does MassDEP review what facilities submit?

Form Problems

1. Form Bug: What do I do if decommissioned units reappear in my package?
You may find that some units you decommissioned last year reappear on your Overview form. This is a bug and we are working to fix it, but it need not slow completion of your Source Registration. To work around, you have 2 options:
1. Uncheck the decommissioned forms on your Overview and validate the Overview – this will remove the forms.
2. Keep the forms in your package and refile them this year – doing this will not cause a problem. Just be sure to enter zero for maximum throughput and annual throughput, and zero for emissions if required. Leave the decommission date in place.

2. Form Bug: What to do I do if an extra monitor or control appears in my form?
You may find that an extra (incomplete) copy of one of your monitors or controls appears on the monitor or control page of your AP1/2/3 form. This monitor/control will have a decommission date already entered – leave the decommission date in the form. This is a bug and we are working to fix it. Unfortunately, you will need to fill out the column for this unwanted copy, inserting data that indicates it is a mistake. For example: facility's designation = "not a control"; installation date = "1/1/2006"; control efficiency = "0". Be sure to leave the decommission date in place – that will prevent the bad copy from reappearing. Please call the SR Help Desk with any questions/problems.

3. What do I do if an SR Form comes up blank?
CANCEL – if you open a form and it is completely blank you should immediately click the blue CANCEL button. Then try to reload the form. If it comes up blank again, call the SR Help Desk. DO NOT enter data into a form that comes up blank – you will lose it. This also applies if the form opens with the facility name or ID number missing. Fortunately, this is now a very rare occurrence.

4. Call the SR Help Desk before you submit a 2nd package . . . why?
If you need to submit a 2nd package this year for any reason (e.g., to add something or correct an error), consult with us first by e-mailing air.quality@state.ma.us or calling the SR Help Desk. The reason is that we want to make sure your first submittal wrote correctly to the database before you try to open a new package. *This ensures your data prefills correctly and that the total emissions are calculated correctly.*

This is important because we did have some problems with packages failing to write to the database last year. This year we want to be sure any problems are fixed before you submit a second time.

5. What to do if the eDEP SR forms will not open or validate?
Disclaimer: Information below is based on MassDEP's experience, which may or may not apply to your computer setup. You are responsible for maintenance of your own system – MassDEP can take NO responsibility for how you use the information below or any consequences of your actions to maintain or upgrade your system.

The most common reason that the forms fail to open (i.e., you try to open a form and get a white screen instead of your form) is that an older version of Adobe reader is still installed on the user's computer.

This is also the most common reason for validation errors (such as a validation error stating that an optional or non-editable field is required – which is never true, or that a password is required – which is also never true).

You should install the latest version of Adobe reader to ensure proper functioning of the forms – version 7.07 and greater will work. **FIRST**, however, you should uninstall any older versions.

How do you uninstall old versions of Adobe and install new ones? One of the most frequent problems among SR form users is that Adobe frequently fails to remove all parts of older versions, and these remnants cause the forms to fail. You will recognize this by the fact that directories for Acrobat 5 or Acrobat 6 remain in the Adobe subdirectory of your C:\Program Files directory. We have found it necessary to manually delete the directories for older versions of Adobe Reader from the C:\Program Files\Adobe\ directory. This was particularly common with Adobe Reader 6 and 5. Deleting these directories AFTER running Windows uninstall from the control panel and BEFORE installing any new version of Adobe usually allowed the forms to load and validate properly.

6. Why can't I login with my TIN?
Sometimes the Tax Identification Number (TIN) we have on file is not correct – this is particularly common for facilities that have not yet filed in the new on-line system. In such cases, we have assigned a temporary TIN – this temporary TIN was included in the SR Notice letter mailed to the facility. Once you login with the temporary TIN, you can correct the TIN on the SR form.

Once you have filed in the new system, you can use the TIN that you reported on your SR form. *If you are having problems getting to your forms, please contact the Source Registration Help Desk* via e-mail at air.quality@state.ma.us for assistance.

Questions About What Units Must Be Reported.

7. Reminder: Complete SR = report on ALL units, including idle units
Please remember that a complete SR submittal includes a report on **ALL** emission units at a facility, *including those that are idle*. Note that if you fail to report on an idle unit for 2 years, you could also trigger requirements for a new plan approval (see 310 CMR 7.02 (3)(m)).

If a unit has been <u>permanently removed</u> but it is still listed on the Overview form as part of your facility, then you must complete the form for that unit one last time, entering a decommission date. That tells MassDEP that the unit is permanently removed/disabled and will keep it from appearing on the list of equipment at your facility in future Source Registrations.

Similarly, if your entire facility is idle, you still must file a Source Registration when it is due.

8. Do you need to report small portable heating units in Source Registration ?
No – small portable heating units, defined as those which have fuel tanks with less than 10 gallons capacity, need not be reported on Source Registrations.

9. Do you report temporary emission units?
Yes, in some cases. If an emission unit is a temporary or mobile unit (such as a temporary emergency generator or a temporary boiler mounted on a trailer) but is of a type that would be reported on if it were fixed and permanent, then it must be included in your Source Registration *IF it operated for 120 days or more during the Year of Record*. Note that if the temporary unit is very similar to other units at the facility, you should consider reporting it with one of the existing units on that unit's form (they would become a combined unit).

The only exception is a unit used for construction equipment – that is, a generator used only to power construction equipment does not need to be reported in Source Registration. Note, however, that a temporary generator used to replace or augment an existing unit at the facility (that is, it is used to power the facility's equipment) during construction would need to be reported.

10. Are there any emissions units you don't need to report in your Source Registration?
No, with a very few exceptions. In general all emissions units must be reported on in each Source Registration. As stated in 310 CMR 7.12 (3)(a)(1), the only emissions units that you do not need to report are those listed as "Insignificant Activities" under 310 CMR 7 Appendix C(5)(i), excerpted below:

> **310 CMR 7 Appendix C(5)(i)**
> (i) Insignificant Activities. Notwithstanding 310 CMR 7.00: Appendix C(5)(h) any emission unit(s) that is part of the following activities is exempt from the requirements of 310 CMR 7.00: Appendix C:
> 1.   Open burning conducted in accordance with the requirements of 310 CMR 7.07(2), 7.07(3)(a) and 7.07(3)(e);

2. Office activities and the equipment and implements used therein, such as typewriters, printers, and pens;
3. Interior maintenance activities and the equipment and supplies used therein, such as janitorial cleaning products and air fresheners; this does not include any cleaning of production equipment or activities regulated by 310 CMR 7.18;
4. Bathroom and locker room ventilation and maintenance;
5. Copying and duplication activities for internal use and for support of office activities at the facility;
6. The activities not regulated by 310 CMR 7.18 in maintenance shops, such as welding, gluing, soldering;
7. First aid or emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation;
8. Laundry operations that service uniforms or other clothing used at the facility that are not regulated by 310 CMR 7.18;
9. Architectural maintenance activities conducted to take care of the buildings and structures at the facility, including repainting, reroofing, and sandblasting;
10. Exterior maintenance activities conducted to take care of the grounds of the facility, including parking lots and lawn maintenance;
11. Food preparation to service facility cafeterias and dining rooms;
12. The use of portable space heaters which reasonably can be carried and relocated by an employee;
13. Liquid petroleum gas (LPG) or petroleum fuels used to power the facility's mobile equipment and not otherwise regulated by the Department;
14. Emergency vents not subject to the accidental release regulations.
15. surface coating and painting processes which exclusively use non-refillable aerosol cans;
16. vacuum cleaning systems used exclusively for commercial or residential housekeeping;
17. ventilating systems used exclusively for heating and cooling buildings, for the comfort of people living or working within the building serviced by said system, which EPA has determined need not be contained in an operating permit;
18. ventilating and exhaust systems for laboratory hoods used:
    a. by academic institutions for academic purposes.
    b. by hospitals and medical care facilities used for medical care purposes and medical research only.
    c. by laboratories which perform laboratory scale activities as defined by OSHA.
    d. by facilities for quality assurance and quality control testing and sampling activities.
19. surface coating and printing processes used exclusively for educational purposes in educational institution excluding those emission units regulated by 310 CMR 7.18; and
20. kilns or ventilating hoods for art or ceramic curricula at colleges, primary or secondary schools.

11. What units fall under the "insignificant activity" class at 310 CMR 7 Appendix C(5)(i)17 for HVAC ?

"Insignificant activities" not required to be reported in Source Registration include: "ventilating systems used exclusively for heating and cooling buildings, for the comfort of people living or working within the building serviced by said system, which EPA has determined need not be contained in an operating permit." This exclusion from Source Registration applies only to those heating/cooling units on which EPA has made a determination in an operating permit – that is, the only units excluded under this provision are those at facilities subject to the operating permit program.

How To Report on Special Cases

12. How do you enter in the forms unusual exhausts, such as short vertical vents?

Some units exhaust vertically, but have housings shorter than 10 ft above the roof of the building (e.g., ventilation exhausts that may be 3-5 ft tall. This type of release point does not require a Stack form – it is considered to be a Non-Stack release point. The forms do not (yet) have a specific code for this type of exhaust. You should select "fugitive" for such a vertical vent (< 10 feet tall). Then describe the release point briefly in the Notes field.

13. Low NOx burners – are they control devices?

No – they are part of your equipment and should not be logged as separate control devices. If you have low NOx burners you should use emission factors that take into account their lower emissions. You should also mention in the notes that the unit incorporates low NOx burners. You can find such emission factors in EPA's emission factor database at: http://www.epa.gov/ttn/chief/efpac/index.html

14. How should Ovens be reported?

An oven should be reported on 1 form only. Use an AP1 for an oven that has no emissions other than those from fuel combustion (such as an oven used for driving off water).

Use an AP2 where there are emissions from the material being baked (such as where solvents are being baked off). On an AP2, the combustion emissions will be reported as one material throughput (segment) and emissions from the material being baked as another segment. Remember to use an SCC for combustion for the fuel segment.

If you need to have ovens that are currently AP1's recoded to AP2's, please contact the SR Help Desk before you begin entering data – we can change the forms for you. *If you have already reported an oven on an AP1, you do NOT need to make any changes – it will be accepted this year.*

15. How should Dryers be reported?

A dryer should be reported on 1 form only. Used an AP1 for a dryer that has no emissions other than those from the fuel combustion (such as for a dryer that produces only water vapor).

However, if the dryer is combined in 1 unit with a spray or print operation, use an AP2 to ensure that the %VOC is reported (this field is only on an AP2). As with an oven, the combustion emissions will be reported as one material throughput (segment) and emissions from the material being dried as another segment. Remember to use an SCC for combustion for the fuel segment. If there is a spray or print process, but is reported as a separate emissions unit (a separate AP2) then you can used an AP1 because you will be reporting only the fuel combustion (again, be sure to use a combustion SCC on the AP1).

If you need to have dryers that are currently AP1's recoded to AP2's, please contact the SR Help Desk before you begin entering data – we can change the forms for you. *If you have already reported a dryer on an AP1, you do NOT need to make any changes – it will be accepted this year.*

16. How should Flares be reported?
Where a flare is a control device on a process emission unit it should be reported in the control device portion of the AP2 for the unit whose emissions it is controlling.

In the past, many flares were reported as incinerators (AP3s) – we are trying to ensure that all control flares are now reported on AP2 forms. If you have a control flare that is an AP3, please do the following: (1) report the flare on the AP2 that it controls, (2) note in the Notes field on the AP2 that you are reporting the flare on the AP2 rather than the AP3, and (3) enter a decommission date in the AP3 (this will cause it to be removed from future SR packages) and enter 0 for all throughputs and emissions on the AP3.

Alternatively, you can e-mail air.quality@state.ma.us requesting that the AP3 be decommissioned by the SR Help Desk, in which case you will not need to include the form in your package.

EXCEPTION: Flares on landfills should be reported on an AP1. Again, if you need a unit recoded, contact the SR Help Desk before you start entering data.

17. How do I report emissions from the fuel use of a thermal oxidizer?
If you have a thermal oxidizer on an emission unit that emits VOCs, you also need to report the emissions from the combustion of natural gas. To do this, add another segment or "raw material" to the AP-2 form for the unit in order to report emissions from natural gas combustion. After you check "Add Raw Material" and validate, another Section B will be generated on which you can enter the natural gas combustion emissions. You will need to enter a natural gas combustion SCC and look up the emission factors for natural gas combustion and calculate the emissions yourself.

18. What do you enter into the basis fields for restrictions if you don't have a permit?
If a unit has a restriction that is based on a regulatory limit rather than a permit condition, then enter the regulatory citation (e.g., 310 CMR . 7.X(XX)). All emissions or throughput restrictions will have a basis.

19. Is a "Fireye" flame monitor a monitor that must be recorded on the forms?
No – a Fireye or other brand of <u>flame monitor</u> is not a monitor that must be reported on an AP1.

20. Which SCC's should be used for residential boilers/water heaters at commercial/institutional facilities ?
Use SCC 10300503 for distillate oil and 10300603 for Natural Gas.

21. Which SCC's should not be used on an AP1?
The AP1 form is for combustion, and the auto calculation feature relies on the use of combustion SCC's as the basis for selecting emission factors. SCC's that are not for combustion should not be used on an AP1 with auto calculation. A new validation feature of the forms will prevent a user from trying to auto calculate emissions using a non-combustion SCC (i.e., one that does not have EPA emissions factors associated with it).   If you use a non-combustion SCC on an AP1, you must do your own emissions calculations.

You can identify combustion SCC from the "Category" field in the list of valid SCC's posted on the SR Web Page.

Tank form (AP4) Questions

22. When does a tank need to be reported?
You must file an AP-4 form for each below- or above-ground storage container that is 500 gallons or larger and stores liquid organic material. Tanks can be combined if the combined capacity does not exceed 50,000 gallons, they are the same construction, and store the same material(s). Do not combine above ground with below ground tanks – use separate AP4 forms for each type. Note that if a single tank is 40,000 gallons or larger, you may need to report emissions for the tank – see question below. Tanks containing wastewater with organic material and waste organic material that will be disposed of off-site need not be reported in Source Registration.

23. What do you enter for Q7.d Temperature on the AP4 tank form?
This field is intended to capture the temperature at which the material is stored. If *underground*, a default value of 55°F may be used if the tank is not heated or cooled. If *above ground*, a default of 48°F may be used if the tank is not heated or cooled. If the tank is *inside a building*, then the temperature at which the building is kept should be given. If the tank is *heated or cooled*, the temperature of the contents should be given.

24. Is there *a de minimis* concentration of organic matter below which an AP4 is not required for a tank?
No – however the objective of the AP4 is to gather data on tanks storing fuel or materials or products. It is not intended to capture wastewater that may contain some organic material. So a waste oil tank must be reported where that oil will be a feed stock or fuel, but a waste oil or waste water tank which contains some oil that will be disposed of off-site need not be reported.

25. When must you calculate emissions from tanks ?
Emissions need to be calculated for *above ground* storage tanks with a capacity equal to or greater than 40,000 gallons containing liquid organic material having a vapor pressure of 1.5 pounds per square inch absolute or greater under actual storage conditions, and for any storage tank with a capacity equal to or greater than 1 million gallons. Emissions calculations are not required for any other type/size of tank.

Emissions for such tanks must be reported on an AP2 form. They may be added as additional materials/throughputs (segments) to an existing AP2 that reports emissions for the tank loading equipment, or they may be reported on a separate AP2. All tanks may be reported on one AP2 – separate segments/forms for each tank are not required (although you may separate them if you wish for clarity). Report emissions for standing/breathing loss separate from drawdown (that is, make them 2 separate segments).

Actual working loss emissions for such tanks are calculated based on the actual loading/unloading of the tanks (not apportioned rack throughput). The potential emissions are calculated by assuming the total unloading rack potential throughput through each tank, and then summing these.   The potential emissions from drawdown should be reported as equal to actual drawdown emissions.

Be sure to provide the Tanks model parameters used in the Notes or as an attachment.

Other Topics

26. When a facility's classification changes, does it still have to report?
Yes. If the facility met the criteria for annual filing during any portion of the Year of Record, then it must report for that Year of Record. This applies even if the facility ceased to meet the criteria for any SR reporting (e.g., removed all subject emission units) at some point during the Year of Record.

If the facility was a 3-year filer that ceased to meet the criteria for any SR reporting during the Year of Record, then the facility must report for that Year of Record (which will likely be its last SR).   If a facility begins to meet criteria for Source Registration during any portion of a Year of Record, then it must file for that Year of Record.

If a facility can demonstrate that it was NOT subject to Source Registration during the Year of Record (e.g., if the facility removed its emission units in the year prior to the Year of Record) then the facility usually does not need to file. Contact the SR Help Desk or your MassDEP Regional Data Manager if you believe this applies to your facility.

27. When a facility closes, does it still have to file a Source Registration?
Yes – if it was an annual filer and was open during any portion of the Year of Record.
No – if it was a 3-year filer that closed before the SR is due, then the SR is not required.

28. Do you have to report if you didn't get a letter from MassDEP?
It depends – if your facility meets the criteria for filing Source Registration, you must report regardless of whether MassDEP sends you a letter. However, you should check the mailing list on the SR web page first to see if you have been deferred to a later year. If you think there is a mistake in the list, and you should be on it (or scheduled for a different year), e-mail air.quality@state.ma.us with an explanation.

NOTE: you may be directed by MassDEP to submit a Source Registration through communications other than the annual notice letters. For example, you may be directed to submit as part of an inspection, enforcement action, or permit. You must submit when so directed regardless of whether or not you receive one of the annual Source Registration notice letters.

29. Will changes filed in my Source Registration (such as decommissioned units) result in MassDEP changing my classification for fee purposes?
No. If you have made – or will make – changes to your facility that you think will change your fee classification or permit status then you must also contact your MassDEP regional office to confirm any changes that could impact your permits or Annual Compliance Fee. Decommissioning emission units does not automatically result in a change to your facility's classification.

30. Does MassDEP review what facilities submit?
Yes. We have automated Quality Assurance programs that search all of the submittals for unusual or inconsistent data. In addition, MassDEP staff will also review individual packages in more detail from time to time.

If a problem is found we many need to contact the owner/operator of the facility or the preparer regarding mistakes or questionable data. Please check your work to avoid you or your client receiving a call from us – if you are reporting anything unusual (such as a reorganization of your emission units), it is good to explain this in the notes. Note: You must be able to access your Source Registration during an inspection of the facility by MassDEP.

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